REMARKS

Claims 1-20 remain pending in this application. Additionally, new claims 21-24 have been added. Therefore, claims 1-24 are pending in the present application.

Applicants acknowledge that the arguments with respect to claims 1-20 under ***Waga*** and ***Lee*** have been fully considered by the Examiner and have been found persuasive, therefore, the previous rejection has been withdrawn and Applicants respectfully respond to the new grounds of rejections herein.

The Examiner rejected claims 1-3 under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 5,969,929 (***Kleveland***). Applicants respectfully traverse this rejection.

Applicants respectfully assert that ***Kleveland*** does not teach, disclose, or suggest, all of the elements of claim 1 of the present invention. ***Kleveland*** actually directs one away from the present invention. ***Kleveland*** is directed towards reducing parasitic capacitance of ESD protection circuits. *See* column 1, lines 35-38. ***Kleveland*** promotes reducing parasitic capacitance in an attempt to avoid reducing the bandwidth of high frequency devices. *See* column 2, lines 5-8. ***Kleveland*** is directed towards attempting to reduce or eliminate the parasitic capacitance to reduce data transmission errors. In contrast to ***Kleveland***, claim 1 of the present invention calls for a plurality of ESD clamp devices being connected to a corresponding one of a plurality of turns on an inductor, wherein the inductor and the parasitic capacitance is used to form a low pass filter. Additionally, ***Kleveland*** does not mention the utilization of parasitic capacitance. ***Kleveland*** merely mentions the undesirability of parasitic capacitance, wherein

claims of the present invention utilizes turns of an inductor in conjunction with the parasitic capacitance of the ESD clamp devices to form a low pass filter. Therefore, ***Kleveland*** does not teach these elements of claim 1. Additionally, claim 1 also calls for an inductor coil for generating an inductance for the low pass filter. The disclosure in ***Kleveland*** does not disclose the plurality of ESD clamp devices with the parasitic capacitance being connected to corresponding turns of an inductor to form a low pass filter. In fact, ***Kleveland*** directs one away from the parasitic capacitance and therefore, does not disclose the low-pass filter elements called for by claim 1 of the present invention. Therefore, claim 1 of the present invention is allowable.

Independent claim 1 is allowable for at least the reasons cited above. Additionally, dependent claims 2-3, which depend from independent claim 1 are also allowable for at least the reasons cited above. Additionally, claim 21, which calls for a device comprising a protection circuit that includes an ESD clamp and inductor, similar to claim 1, is also allowable for at least the reasons cited above.

The Examiner rejected claims 4-20 under 35 U.S.C. § 103(a) as being unpatentable over ***Kleveland*** in view of U.S. Patent No. 5,576,680 (***Ling***). Applicants respectfully traverse this rejection.

The Examiner provides that ***Kleveland*** does not disclose that each of the turns of the inductor is formed from a separate layer of the integrated circuit. The Examiner then provides the disclosure of ***Ling*** to provide the inductive circuit 400 by connecting a plurality of inductor coils having a plurality of turns formed from different horizontal planes of the IC chip. *See* col.

7, lines 59-col. 8, lines 7. However, Applicants respectfully assert that the addition of ***Ling*** does not make up for the deficits of ***Kleveland***. One reason is because ***Kleveland*** does not disclose the use of the parasitic capacitances provides by the plurality of ESD clamp devices being coupled to corresponding turns of an inductor to form a low pass filter. ***Ling*** does not provide this disclosure, therefore, the mere addition of ***Ling*** does not make up for the deficit of ***Kleveland***.

Ling simply does not disclose ESD protection or utilization of parasitic capacitance with inductor turns to make up for the deficit of ***Kleveland***. ***Ling*** is merely directed to forming an inductive circuit on a semiconductor chip. ***Ling*** provides for patterned lines to form an inductor. Although ***Ling*** discloses a plurality of inductor coils formed on different horizontal planes, ***Ling*** does not disclose the subject matter that is lacking in ***Kleveland,*** but called for by claims of the present invention. *See* col. 7, lines 59-65. Therefore, combining ***Kleveland*** and ***Ling*** would still not disclose the elements of utilizing a plurality of ESD clamp devices with a parasitic capacitance being connected to corresponding turns of an inductor, in order to provide a low pass filter, as called for by claim 4 of the present invention. Therefore, claims 3-17, which directly or indirectly depend from claim 4, are not taught, disclosed, or made obvious by ***Kleveland***, ***Ling***, or their combination. Additionally, claim 18, which provides a method for forming a plurality of conductive layers provides ESD clamp devices, which are then connected to corresponding coil turns to form a low pass filter for at least the reasons described above. Therefore, claim 18 of the present invention is allowable. Additionally, claims 19 and 20, which depend from claim 18 are also allowable for similar reasons cited above. Furthermore, newly added claim 21, which calls for a device comprising a plurality of ESD clamp devices with a parasitic capacitance being connected to corresponding turns of an inductor, in order to provide a low pass filter, is also not

taught or made obvious by ***Kleveland***, ***Ling***, or their combination, for at least the reasons cited above.

Furthermore, Applicants respectfully assert that one skilled in the art would not combine ***Kleveland*** and ***Ling*** to make obvious all of the claims of the present invention. ***Kleveland*** is directed to distributed ESD protection in a device, wherein ***Ling*** is directed to forming an inductor on a substrate using line patterns. Without improper hindsight, one skilled in the art would not combine the teaching of ***Kleveland*** and ***Ling*** to make obvious all of the claims of the present invention. However, ***arguendo***, even if ***Kleveland*** and ***Ling*** were combined, all of the elements of the claims of the present invention would not be obvious to those skilled in the art as described above.

Independent claims 4, 18, and 21 (newly added) are allowable for at least the reasons cited above. Additionally, dependent claims 5-17, 19-20, and 22-24 (newly added), which respectively depend from independent claims 4, 18, and 21 are also allowable for at least the reasons cited above.

Reconsideration of the present application is respectfully requested.

In light of the arguments presented above, Applicants respectfully assert that claims 1-24 are allowable. In light of the arguments presented above, a Notice of Allowance is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Houston, Texas telephone number (713) 934-4069 to discuss the steps necessary for placing the application in condition for allowance.

Respectfully submitted,

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